ESEA Flexibility

Peer Panel Notes

State Request: ARKANSAS

Date: 3/27/12

REVIEW AND EVALUATION OF REQUESTS

The U.S. Department of Education (Department) will use a review process that will include both external peer reviewers and staff reviewers to evaluate State educational agency (SEA) requests for this flexibility. This review process will help ensure that each request for this flexibility approved by the Department is consistent with the principles, which are designed to support State efforts to improve student academic achievement and increase the quality of instruction, and is both educationally and technically sound. Reviewers will evaluate whether and how each request for this flexibility will support a comprehensive and coherent set of improvements in the areas of standards and assessments, accountability, and teacher and principal effectiveness that will lead to improved student outcomes. Each SEA will have an opportunity, if necessary, to clarify its plans for peer and staff reviewers and to answer any questions reviewers may have during the on-site review. The peer reviewers will then provide comments to the Department. Taking those comments into consideration, the Secretary will make a decision regarding each SEA's request for this flexibility. If an SEA's request for this flexibility is not granted, reviewers and the Department will provide feedback to the SEA about the components of the SEA's request that need additional development in order for the request to be approved.

This document provides guidance for peer review panels as they evaluate each request during the on-site peer review portion of the review process. The document includes the specific information that a request must include and questions to guide reviewers as they evaluate each request. **Questions that have numbers or letters represent required elements.** The italicized questions reflect inquiries that reviewers will use to fully consider all aspects of an SEA's plan for meeting each principle, but do not represent required elements.

In addition to this guidance, reviewers will also use the document titled *ESEA Flexibility*, including the definitions and timelines, when reviewing each SEA's request. As used in the request form and this guidance, the following terms have the definitions set forth in the document titled *ESEA Flexibility*: (1) college- and career-ready standards, (2) focus school, (3) high-quality assessment, (4) priority school, (5) reward school, (6) standards that are common to a significant number of States, (7) State network of institutions of higher education, (8) student growth, and (9) turnaround principles.

Review Guidance

Consultation

1. Did the SEA meaningfully engage and solicit input on its request from teachers and their representatives?

   ➤ *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?*

   ➤ *Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?*

Consultation Question 1 Panel Response
Tally of Peer Responses: 5 Yes, 1 No

Response Component	Peer Panel Response
Rationale	The Arkansas Department of Education (ADE) identified many instances of its solicitation of feedback during the planning process. Teachers and their representative were significantly involved in consultations regarding the SEA's request concerning Principle 3, and teachers were significantly involved in consultations concerning Principle 1.
Strengths	• Teachers and their representative were significantly involved in the SEA's request regarding Principle 3. • Teachers were involved in the SEA's request regarding Principle 1.
Weaknesses, issues, lack of clarity	• It is difficult to find instances in Principle 2 where teachers and their representatives were involved. • With the exception of Principle 3, the participation seemed to be limited to notice-and-comment, rather than participation in actual design. • Although the SEA consulted with adult English Learners, it did not provide sufficient evidence of consultation with teachers of English Learners and students with disabilities (p. 10).
Technical Assistance Suggestions	None.

2. Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes?

➢ *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?*

➢ *Did the SEA indicate that it modified any aspect of its request based on stakeholder input?*

➢ *Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?*

Consultation Question 2 Panel Response

Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	ADE identified several strategies it followed to solicit feedback from diverse stakeholders and provided examples of stakeholder comments. However, the SEA did not provide sufficient evidence of meaningful consultation with diverse stakeholder groups.
Strengths	• ADE identified several strategies it employed to solicit feedback from diverse stakeholders and provided examples of stakeholder comments.
Weaknesses, issues, lack of clarity	• ADE has not explicitly identified where it modified its request based on stakeholder input from parents, students, community-based organizations, business organizations or Indian tribes. • The SEA did not provide sufficient evidence of meaningful consultation with representatives of English Learners, students with disabilities, civil rights organizations, community-based organizations, business organizations, or Indian tribes (p. 10).
Technical Assistance Suggestions	None.

Principle 1: College- and Career-Ready Expectations for All Students

Note to Peers: Staff will review 1.A Adopt College-And Career-Ready Standards, Options A and B.

1.B   Transition to college- and career-ready standards

1.B   Part A: Is the SEA's plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year realistic, of high quality?
Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.

1.B Panel Response, Part A
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	The SEA has presented a strong plan to transition to and implement college- and career-ready standards.
Strengths	• Arkansas has adopted the Common Core State Standards (CCSS). • Arkansas' Common Core Guiding Coalition (CCGC) is broadly representative of educators, representatives of higher education, and parents. • Each school defines a mathematics and English/language arts (ELA) lead to work with principals to coordinate the CCSS transition. • The SEA provides support materials, regional institutes, and an impressive list of professional development sessions tied to CCSS (Att. 8, Att. 13, Att. 13 at Att. D). • The SEA has enhanced its college- and career-ready curriculum via its SmartCore initiative. • A detailed Strategic Plan for the Implementation of CCSS that includes a timeline along with roles and responsibilities for the school, district, partners and/or regional structures and State has been developed. This plan is supplemented by an even more detailed Guide for Professional Development Planning (Att. 13). • The SEA is working to align CCSS rollout with the Teacher Excellence and Support System to ensure connections to support effective instruction for all students. • The crosswalk documents regarding the mathematics curricula are very strong.

Weaknesses, issues, lack of clarity	• There appears to be a discrepancy between the SEA's report in the Request of 95-96 percent congruence between existing and CCSS standards, and the extent of realignment (particularly grade shifts) called for by the Big Shifts documents to bring existing materials into alignment. (p. 19). • While the SEA describes an extensive alignment process, the Big Shifts documents indicate substantial steps required to bring existing curricula and materials into alignment with CCSS.
Technical Assistance Suggestions	• Ensure that the SEA takes the necessary steps to assist LEAs, schools, and educators to identify the extent of the shifts (including grade shifts) required to bring curricula, materials, instruction and assessments into conformity with the CCSS. Consider enhancing the ELA Big Shifts document comparably to the math Big Shifts document.

Part B: Is the SEA's plan likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with the college- and career-ready standards?

Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.

1.B Panel Response, Part B
Tally of Peer Responses: 2 Yes, 4 No

Response Component	Peer Panel Response
Rationale	The SEA's plan has some strengths for transitioning the instruction of English Learners to the CCSS, but the panel found major weaknesses in the transition as it relates to students with disabilities.
Strengths	• The SEA's request addresses professional development of teachers of English Learners (e.g., redesign of ESL Academy training specifically to address CCSS). • The SEA intends to develop resources and materials addressing the ELP standards that have been developed. (p. 19).

Weaknesses, issues, lack of clarity	• It's not clear that these measures are comprehensive or that they will address general education teachers who teach English Learners and students with disabilities. • CCGC is not broadly representative of students with disabilities and English Learners. • The SEA does not address professional development for all teachers, instead focusing on those who teach exclusively students with disabilities and English Learners. • Although the SEA will use its Staff Personnel Development Grant to develop tools, there is insufficient evidence of CCSS-alignment. (pp. 24-25). • The SEA does not provide sufficient evidence to indicate that its current ELP standards correspond to CCSS. • The SEA does not provide sufficient evidence of how it intends to assist educators of students with disabilities in all instructional settings to transition to CCSS.
Technical Assistance Suggestions	• Develop supports to assist educators of students with disabilities in all instructional settings to transition to CCSS. • Ensure the ELP standards are aligned with CCSS.

1.C   Develop and Administer Annual, Statewide, Aligned, High-Quality Assessments that Measure Student Growth

1.C   Did the SEA develop, or does it have a plan to develop, annual, statewide, high-quality assessments, and corresponding academic achievement standards, that measure student growth and are aligned with the State's college- and career-ready standards in reading/language arts and mathematics, in at least grades 3-8 and at least once in high school, that will be piloted no later than the 2013–2014 school year and planned for administration in all LEAs no later than the 2014–2015 school year, as demonstrated through one of the three options below? Does the plan include setting academic achievement standards?

Note to Peers: Staff will review Options A and C.

If the SEA selected Option B:
If the SEA is neither participating in a State consortium under the RTTA competition nor has developed and administered high-quality assessments, did the SEA provide a realistic, high-quality plan describing activities that are likely to lead to the development of such assessments, their piloting no later than the 2013–2014 school year, and their annual administration in all LEAs beginning no later than the 2014–2015 school year? Does the plan include setting academic achievement standards?

1.C, Option B Panel Response

☒ *Not applicable because the SEA selected 1.C, Option A or Option C*

Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

Principle 1 Overall Review

Is the SEA's plan for transitioning to and implementing college-and career-ready standards, and developing and administering annual, statewide, aligned high-quality assessments that measure student growth, comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Principle 1 Overall Review Panel Response

Tally of Peer Responses: 5 Yes, 1 No

Response Component	Peer Panel Response
Rationale	The SEA has presented a strong plan to transition and implement college- and career-ready standards. The SEA's plan has some strengths for transitioning the instruction of English Learners to the CCSS, but the panel found major weaknesses in the transition as it relates to students with disabilities.

Response Component	Peer Panel Response
Strengths	• Arkansas has adopted the CCSS. • CCGC is broadly representative of educators and higher education and parents. • Each school defines a math and ELA lead to work with principals to coordinate the CCSS transition. • The SEA provides support materials, regional institutes, and an impressive list of professional development sessions tied to CCSS. (Atts. 8, 13 at p. 51). • The SEA has enhanced its college- and career- ready curriculum via its SmartCore initiative. • Detailed Strategic Plan for the Implementation of CCSS that includes a timeline along with roles and responsibilities for the school, district, partners and/or regional structures and State has been developed. This plan is supplemented by an even more detailed Guide for Professional Development Planning (Att. 13). • The SEA is working to align CCSS rollout with the Teacher Excellence and Support System to ensure connections to support effective instruction for all students. • The crosswalk documents regarding the mathematics curricula are very strong. • The SEA's request addresses professional development of teachers of English Learners (e.g., redesign of ESL Academy training specifically to address CCSS). • The SEA intends to develop resources and materials addressing the ELP standards that have been developed. (p. 19).

Response Component	*Peer Panel Response*
Weaknesses, issues, lack of clarity	• There appears to be a discrepancy between the SEA's report in the Request of 95-96 percent congruence between existing and CCSS standards, and the extent of realignment (particularly grade shifts) called for by the Big Shifts documents to bring existing materials into alignment (p. 19). • While the SEA describes an extensive alignment process, the Big Shifts documents indicate substantial steps required to bring existing curricula and materials into alignment with CCSS. • CCGC is not broadly representative of students with disabilities and English Learners. • The SEA does not address professional development for all teachers, instead focusing on those who teach exclusively students with disabilities and English Learners. • Although the SEA will use its Staff Personnel Development Grant to develop tools, there is insufficient evidence of CCSS-alignment (p. 24-25). • The SEA does not provide sufficient evidence to indicate that its current ELP standards correspond to CCSS. • The SEA does not provide sufficient evidence of how it intends to assist educators of students with disabilities in all instructional settings to transition to CCSS.
Technical Assistance Suggestions	• Ensure that the SEA takes the necessary steps to assist LEAs, schools, and educators to identify the extent of the shifts (including grade shifts) required to bring curricula, materials, instruction and assessments into conformity with the CCSS. Consider enhancing the ELA Big Shifts document comparably to the math Big Shifts document. • Develop supports to assist educators of students with disabilities in all instructional settings to transition to CCSS. • Ensure the English Language Proficiency standards are aligned with CCSS.

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

2.A   Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support

2.A.i   Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2012–2013 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students? (*note to Peers, please write to this question after completing 2.A.i.a and 2.A.i.b*)

2.A.i Panel Response
Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	• The SEA proposes a differentiated accountability, recognition, and tiered support system (DARTSS) that will be phased in to align with CCSS and educator effectiveness system (TESS) implementation. Key system features include a publically reported school rating system that evaluates school performance against AMOs to produce ratings of (1) Exemplary, (2) Achieving, (3) Needs Improvement, (4) Needs Improvement focus schools, (5) Needs Improvement priority schools. • The framework includes measures of (1) proficiency status (Literacy, Mathematics, Science, high school end of course exams), (2) growth to standard, and (3) graduation rates. These are analyzed against AMOs for All Students and a combined subgroup called TAGG (Targeted Achievement Gap Group) (p.41). The evidence and school ratings will be used for differentiated support and intervention based on ADE's continuous improvement planning and monitoring process known as the Accountability for Implementation and Change in Practice (ACSIP) (p.40). • However, because of inadequate differentiation among schools within the large "achieving" category, the apparent masking of the lower performance of African Americans, Hispanics, students with disabilities and English Learners in the TAGG group, the diminution of support for the large majority of schools (moving from 1 to 3-year planning cycle), the at best modest incentive to improve support for schools in the "needs improvement" category (other than focus and priority schools), and the lack of rigor of the State tests and cut scores (not changing until PARCC), it is likely that the vast majority of lower performing students, including African-American, Hispanic, students with disabilities and English Learner students will be in schools with at best modest incentives to improve those students' learning outcomes and to get them to college readiness.

Response Component	Peer Panel Response
Strengths	• In DARTSS, the All Students graduation rate, the non-TAGG and TAGG graduation rates, as well as ESEA subgroup graduation rates will be calculated and reported (p.52). • The SEA proposes using both a combined subgroup for accountability determinations and full disaggregation for reporting purposes. • The SEA proposes both status and growth to standard AMOs. Also, students who are proficient but not making adequate annual growth will be held accountable (p.51). • Schools with fewer than 40 students will use three-year weighted averages. • The SEA has a strong data system that absorbs local assessment data as well as State assessments providing access to diagnostic info (p. 48). • The proposal gives more flexibility to higher performing schools, and more direct intervention to lower performing schools (p. 53).

Response Component	Peer Panel Response

Weaknesses, issues, lack of clarity	• While a differentiated system for schools is established, a parallel system for district accountability and reporting is not described.
	
	• While growth to standard is used, normative growth is not. Growth to standard is highly correlated with status. Normative growth is not and thus provides insight into disparities in growth rates among student groups. A normatively high growth may not be adequate and normatively low growth rates can be adequate.
	
	• As noted in Table 2.2. on p. 44, the minimum n-size of 40 is larger than necessary and additional students could be included into the accountability system by lowering the n-size. This problem is enhanced by the allowance of an n-size of 5 percent in schools with more than 800 students (p. 54).
	
	• Many aspects of the proposed system weaken the extent to which it differentiates among the large majority of schools (and students) in ways that create strong incentives to continuously improve:
	
	  o Rigor of tests and cut scores (which will not change until PARCC) (pp.32, 37-39), which leads to high and increasing rates of proficiency (pp.42-43, 60-62).
	  o Insufficient number of accountability categories (Achieving and Needs Improvement) (pp. 40-41, 54), which are only modestly augmented by the Federal requirements for focus and priority schools.
	  o K-8 schools get the highest designation (Achieving) if they have high proficiency even if low progress or vice versa, and can be Achieving in English language, even if not in math, and vice versa (pp. 52, 94).
	  o By doing all calculations of proficiency and growth based on three-year averages, schools trending downwards can avoid accountability consequences. (p. 49)
	  o Treating 94 percent proficiency the same as 100 percent proficiency for purposes of the requirement to cut the percentage of students below proficiency in half by 2017, will insulate still more schools from any risk of being "Needs Improvement" even if some student are slipping (Addendum).
	  o Undermining differentiation/incentives, TAGG, which, together with "all students", determines all designations and consequences in the accountability system and AMOs (pp. 41, 45, 52, 54), will mask continued poor performance of African-American, Hispanic, English Learners and students with disabilities.

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Response Component	Peer Panel Response

Technical Assistance Suggestions	• Clarify how the current school accreditation system (mentioned on p. 95) aligns with and adds value to the DARTSS System.
	
	• The SEA should consider using the TAGG in addition to the other ESEA subgroups instead of in place of them.
	
	   o Inform U.S. Department of Education how many schools = Achieving, Needs Improvement in one or both subjects; what percent of those are reward, focus, priority
	   o Reduce minimum n-size threshold of 40 to 25 (p. 44) and remove the policy allowing schools with over 800 total students to avoid sub-group designation by using a higher minimum n-size.
	   o Include African Americans (14 percent currently omitted) and Hispanics (8 percent omitted) as a group in TAGG (p.46).
	   o Attach meaningful consequences for the AMOs relating to African-American, Hispanic, students with disabilities, and English Learners, or weight the subgroups' outcomes more heavily in measuring TAGG – e.g., giving them weight commensurate with their statewide, or their schoolwide gap; this latter approach would also give a lot more weight to Hispanic, students with disabilities and English Learners).
	   o Differentiate within the "achieving" group to indicate relatively lower and higher achievers to create incentives and provide support for bottom of that category.
	   o Increase consequences/incentives for "needs improvement" schools not at or close to focus or priority.
	   o Extend the information on p. 75 comparing median gaps between All Students and TAGG and White/students with disabilities to include other categories, e.g., African-American). Compare the distribution of focus schools that would emerge if the other gaps were used to the distribution the SEA's proposed approach achieves.

a. Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?

2.A.i.a Panel Response
Tally of Peer Responses: *2 Yes, 4 No*

Response Component	Peer Panel Response

Response Component	*Peer Panel Response*
Rationale	The SEA's accountability system provides differentiated recognition, accountability, and support for LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement for all students and subgroups of students in reading/language arts and mathematics, as well as Science and end of course tests in high school, (2) longitudinal growth to standard, (3) graduation rates for all students and all subgroups. However, the level of rigor of the tests and cut scores appears to be low, the level of "differentiation" is fairly minimal, and substitution of TAGG subgroup for other groups in deciding accountability and AMOs dilutes impact of poorly performing African-American, Hispanic, students with disabilities and English Learners, keeping poor performance among the subgroups from actually driving the outcomes. In other words, while the performance of the ESEA subgroups against AMOs is reported, almost no weight is given to the performance of the ESEA subgroups in the SEA's differentiated accountability system.
Strengths	• The SEA is using the flexibility opportunity to re-conceptualize its statewide system of support and to restructure its Division of Learning Services and Accountability to align personnel capacity to interventions (p.53). • In DARTSS, the All Students graduation rate, the non-TAGG and TAGG graduation rates, as well as ESEA subgroup graduation rates will be calculated and reported (p.52). • The SEA proposes using both a combined subgroup (TAGG) for accountability determinations and full disaggregation (ESEA subgroups) for reporting purposes. • The SEA proposes to implement status and growth to standard AMOs. Also, students who are proficient but not making adequate annual growth will be held accountable (p.51). • Schools with fewer than 40 students will use three-year weighted averages.
Weaknesses, issues, lack of clarity	• While a clear differentiated accountability system for schools is established, a parallel system for district accountability and reporting is not described. • The SEA does not sufficiently distinguish among schools because most schools will be in the achieving category or the needs improvement category, but not fall within the separate categories designating priority or focus schools. And, consequences are almost entirely reserved for priority and focus schools, leaving others schools without much incentive to continue improving. • As a result of the continuation of the 40 n-size threshold, there is a potential unintended consequence to mask the low-outcomes of African-American, students with disabilities, and English Learner students within the TAGG combined group in which economically disadvantaged students strongly predominate.

Response Component	Peer Panel Response

Technical Assistance Suggestions	• Revise the school rating system so it provides classifications of schools that adequately differentiate between high-performing schools and middle-performing schools as well as those with large gaps and those with chronic low-performance.
	
	• Consider the following alternatives:
	
	  o Including the traditionally under-performing African-American and Hispanic subgroups in the TAGG instead of the economically disadvantaged subgroup.
	  o Holding schools accountable for individual disaggregated subgroup AMOs in addition to accountability for combined subgroup (TAGG) AMOs.
	  o Comparing the school's TAGG performance to the statewide median percentage of non-TAGG students' proficiency, and use that gap if it is greater than the within-school gap.
	  o Weighting the outcomes of African-American, Hispanic, or students with disabilities more heavily in measuring TAGG AMOs– e.g., giving them weight commensurate with their statewide or their schoolwide gap.

b. Does the SEA's differentiated recognition, accountability, and support system create incentives and provide support that is likely to be effective in closing achievement gaps for all subgroups of students?

2.A.i.b Panel Response

Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	The panel found that the SEA's proposed differentiated accountability and support system fails to create incentives and provide support that is likely to be effective in closing achievement gaps for all subgroups of students.
Strengths	• In DARTSS, the All Students graduation rate, the non-TAGG and TAGG graduation rates, as well as ESEA subgroup graduation rates will be calculated and reported (p.52). • The SEA proposes using a combined subgroup for accountability determinations and a full disaggregation for reporting purposes.

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Response Component	*Peer Panel Response*

Weaknesses, issues, lack of clarity	• The SEA does not provide an educationally sound explanation for constructing a combined subgroup that includes members of some, but not all, of the State's historically lowest performing ESEA subgroups.
	
	• Many aspects of the proposed system weaken the extent to which it differentiates among the large majority of schools (and students) in ways that create strong incentives to continuously improve:
	
	    o Rigor of tests and cut scores (which will not change until PARCC; (pp.32, 37-39), which leads to high and increasing rates of proficiency (pp.42-43, p.60-62).
	    o Insufficient number of accountability categories (Achieving and Needs Improvement) (pp. 40-41, 54), which are only modestly augmented by the Federal requirements for focus and priority schools.
	    o K-8 schools get the highest designation (Achieving) if they have high proficiency even if they have low progress, or vice versa, and can be achieving in ELA, even if not in math, and vice versa (pp. 52, 94).
	    o By doing all calculations of proficiency and growth based on three-year averages, schools trending downwards can avoid accountability consequences (p. 49).
	    o Treating 94 percent proficiency the same as 100 percent proficiency for purposes of the requirement to cut the percentage of students below proficiency in half by 2017, may insulate more schools from any risk of being categorized as Needs Improvement even if some subgroups or particular students consistently fall behind (Addendum).
	
	• Undermining differentiation/incentives: the combined subgroup, TAGG, which, together with "all students", determines all designations and consequences in the LEA's accountability system and AMOs (pp. 41, 45, 52, 54) will mask continued poor performance of African-American, Hispanic, English Learners and students with disabilities because the differentiated ESEA subgroups have no weight in the analysis.
	
	• As noted in Table 2.2. on p. 44, the minimum n-size of 40 is larger than necessary and additional students could be included into the accountability system by lowering the n-size. This problem is enhanced by the allowance of an n-size of 5 percent in schools with more than 800 students (p. 54).

Response Component	*Peer Panel Response*

Technical Assistance Suggestions	• Consider decreasing the threshold n-size and eliminating the 5 percent rule for schools over 800 students.
	
	 • Consider basing the Full Academic Year (FAY) definition on single-year enrollment and test taking, which will increase the number of students included in the n-size substantially.
	
	 • Move to a school rating system that provides four or more classifications of schools that adequately differentiate between high-performing schools and middle-performing schools as well as those with large gaps and those with chronic low-performance.
	
	 • Consider the following alternatives:
	
	     o Including the traditionally under-performing African-American and Hispanic subgroups in the TAGG instead of the economically disadvantaged subgroup.
	
	     o Holding schools accountable for individual disaggregated subgroup AMOs in addition to the combined subgroup.
	
	     o Comparing the school's TAGG performance to the statewide median percentage of non-TAGG students' proficiency, and use that gap if it is greater than the within-school gap.
	
	     o Weighting the outcomes of African-American, Hispanic, and students with disabilities more heavily in measuring TAGG AMOs– e.g., giving them weight commensurate with their statewide or their schoolwide gap.

     c.   *Note to Peers: Staff will review 2.A.i.c*
Note to Peers: Staff will review 2.A.ii Option A.

ONLY FOR SEAs SELECTING OPTION B: If the SEA elects to include student achievement on assessments other than reading/language arts and mathematics in its differentiated recognition, accountability, and support system by selecting Option B, review and respond to peer review questions in section 2.A.ii. If the SEA does not include other assessments, go to section 2.A.iii.

2.A.ii   Did the SEA include student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools?

     a.   Note to Peers: Staff will review 2.A.ii.a

b.   Does the SEA's weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State's college- and career-ready standards?

c.   Note to Peers: Staff will review 2.A.ii.c

2.A.ii.b PANEL RESPONSE
☒ Not applicable because the SEA selected 2.A, Option A
Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

2.B   Set Ambitious but Achievable Annual Measurable Objectives

2.B   *Note to Peers: Staff will review Options A and B.*

Did the SEA describe the method it will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics, for the State and all LEAs, schools, and subgroups, that provide meaningful goals and are used to guide support and improvement efforts through one of the three options below?

If the SEA selected Option C:
Did the SEA describe another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups?

i.   Did the SEA provide the new AMOs and the method used to set these AMOs?

ii.   Did the SEA provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs?

iii. If the SEA set AMOs that differ by LEA, school, or subgroup, do the AMOs require LEAs, schools, and subgroups that

are further behind to make greater rates of annual progress?

iv. Did the SEA attach a copy of the average statewide proficiency based on assessments administered in the 2010−2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups? (Attachment 8)

➢ *Are these AMOs similarly ambitious to the AMOs that would result from using Option A or B above?*

➢ *Are these AMOs ambitious but achievable given the State's existing proficiency rates and any other relevant circumstances in the State?*

➢ *Will these AMOs result in a significant number of children being on track to be college- and career-ready?*

2.B, Option C (including Questions i–iv) Panel Response
☐ Not applicable because the SEA selected 2.B, Option A or Option B
Tally of Peer Responses: 1 Yes, 5 No

Response Component	Peer Panel Response
Rationale	• The SEA's proposal is based on Option A (set AMOs in annual equal increments toward the goal of reducing by half the students in the "all students" group and in each subgroup within six years). However, due to inclusion of a 6 percent variance for highest performing and/or highest growth and highest graduation rate schools, the AMO approach falls under option C (p. 62). • The SEA states that the 6 percent variance is intended to address a concern that high performing schools could be labeled as Needs Improvement schools because their proficiency gap is so small in 2011 and their AMOs would place the school in the range of performance that is difficult to exceed consistently on an annual basis, strictly due to random error. The SEA provided the hypothetical example of a school at 94.5 percent proficient in 2011 demonstrates exemplary performance, scores 94.5 percent again in 2012, but because they must increase to 95 percent the school becomes a Needs Improvement school (p. 62). • The SEA states that the use of a three-year weighted average, or the most current year percentage (depending on the n-size of the school), provides some relief from being mislabeled because the three-year weighted average is more stable for schools with a small n-size. However, the students included each year will vary as these calculations are based on cross-sectional data. The SEA proposes a 6 percent variance at the top of the proficiency, growth and graduation rate continuums such that all schools are required to cut the proficiency, growth and graduation rate gaps in half within six years, but schools are credited as Achieving when their percentage Proficient, percentage meeting growth, and/or percentage graduating meet or exceed 94 percent (p. 62).
Strengths	None.

Response Component	*Peer Panel Response*
Weaknesses, issues, lack of clarity	• The 6 percent variance requested basically means 94 percent proficiency can be considered 100 percent, when in fact it is not the same. The problem the SEA observes may be a problem inherent in the option A method chosen or it may not be a problem at all given that the example provided did not address subgroups, which may in fact have larger gaps than the "all students" group. It is not clear whether the SEA has run simulations that establish that the concern for which it has designed the 6 percent variance actually is a problem when the TAGG vs. non-TAGG groups are examined.
Technical Assistance Suggestions	• The SEA should consider using a three-year combined cohort aggregating all students enrolled plus the latest year levels and using whichever quantities are greater (see, for example, Colorado's approved practice). This might offset the problem the SEA is attempting to solve with the 6 percent variance. • The SEA might also consider using a multi-measure framework that rates schools on the indicators chosen but then rolls up the multiple ratings into a single rating for the school.

2.C Reward Schools

2.C.i Did the SEA describe its methodology for identifying highest-performing and high-progress schools as reward schools?

2.C.i PANEL RESPONSE

Response Component	*Peer Panel Response*
Rationale	The SEA described its methodology for identifying highest-performing and high-progress schools as reward schools.
Strengths	None.
Weaknesses, issues, lack of clarity	• The methodology for identifying Exemplary Schools lacks development and does not include growth to standard. It does not take advantage of the evidence used for school classifications. It appears that some of the high progress schools identified may not have either high achievement or high growth to standard. If so, the recognition may not be considered meaningful. • Given the small number of reward schools and the dilution of the reward structure by the existing statutory requirements, the reward category tied to the SEA's new accountability system will create weak incentives for schools to strive to excel on the SEA's new index.
Technical Assistance Suggestions	• Consider limiting the award of flexibility to only those identified as Exemplary. • Consider including growth-to-standard in the reward school definition, which is already in the school classification system.

Note to Peers: Staff will review 2.C.ii.

2.C.iii Are the recognition and, if applicable rewards, proposed by the SEA for its highest-performing and high-progress schools likely to be considered meaningful by the schools?

➤ *Has the SEA consulted with LEAs and schools in designing its recognition and, where applicable, rewards?*

2.C.iii PANEL RESPONSE

Tally of Peer Responses: 5 Yes, 1 No

Response Component	Peer Panel Response
Rationale	The SEA consulted with stakeholders and chose three kinds of recognition/rewards based on input: (1) paperwork reduction by allowing a three-year rather than annual cycle for improvement plans, (2) designation as Model Schools for best practice sharing, and (3) financial awards subject to appropriation.
Strengths	• The SEA is attempting to reconcile the existing statute for school recognition with the ESEA flexibility guidance and capture values expressed by stakeholders for the kinds of schools that should be eligible for Exemplary status recognition. • The opportunity to serve as a model school and cooperate with other schools in the State on best practice (p. 65) is likely to be meaningful to the instructional staff. • Financial awards subject to appropriation.
Weaknesses, issues, lack of clarity	• The meaningfulness of the methodology for identifying Exemplary Schools is undermined by lack of development and does not include growth to standard. It does not take advantage of the evidence used for school classifications. It appears that some of the high progress schools identified may not have either high achievement or high growth to standard. If so, the recognition may not be considered meaningful. • The extension of most rewards (e.g., flexibility from State requirements), to all achieving schools, rather than just reward schools, dilutes the meaningfulness of "reward status." (pp. 53, 65, 93).
Technical Assistance Suggestions	• Consider limiting the award of flexibility to only those identified as Exemplary. • Consider including growth-to-standard in the reward school definition, which is already in the school classification system

2.D   Priority Schools

Note to Peers: Staff will review 2.D.i and 2.D.ii.

2.D.iii Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools?

    a.   Do the SEA's interventions include all of the following?

        (i)   providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;

        (ii)   ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;

        (iii) redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;

        (iv) strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;

        (v)   using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;

        (vi) establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs; and

        (vii) providing ongoing mechanisms for family and community engagement?

2.D.iii.a (including questions (i)-(vii)) Panel Response

Tally of Peer Responses: 2 Yes, 4 No

Response Component	Peer Panel Response
Rationale	The SEA proposes a process-based approach for school improvement (diagnostics, planning, coaching, monitoring) to intervene in priority schools. The processes outlined are reasonable and necessary to engage in this work, however, most members of the panel concluded that the interventions described do not fully align with the turnaround principles due to their apparent lack of aggressive interventions in the most chronically under-performing schools (pp. 67-71), which will likely prevent the intervention from achieving dramatic and systemic change.
Strengths	• The SEA's diagnostic approach is a strength: "The ADE proposes to engage district leadership in diagnostic analysis and needs assessment in partnership with priority school leadership, with oversight for quality and effectiveness provided by the ADE. The ADE proposes to require priority schools to engage in comprehensive diagnostic analysis and needs assessment in tandem with an ADE School Improvement Specialist (SIS) and School Support Team from the ADE (p.67)." • The SEA's addendum attempts to address questions of increasing teacher quality – recruiting effective teachers, improving the capacity of teachers, removing ineffective teachers (Addendum, p. 3).
Weaknesses, issues, lack of clarity	• A majority of the panel found that the interventions described do not appear to fully align with the turnaround principles. For example, the implementation timetable on pp. 69-71, which provides the greatest detail of what ADE envisions, does not specify conditions for replacement of leadership or staff, change in school governance, or a meaningful new school development strategy. • While the SEA-furnished addendum lists leadership change in an attempt to better align with the turnaround principles, the SEA provides no mechanism to explain how this process will occur. • While the addendum lists teacher effectiveness and intent to remove ineffective teachers as goals, it does not provide a mechanism to explain how ineffective teachers will be removed from priority schools. • There is no clear explanation of the consequences of failing to exit priority status after some reasonable period. • There is no apparent recognition of geographic (urban, rural) matters in delivering support. • The approach described does not address governance and management of priority schools.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• Ensure that the Scholastic Audit rubric is aligned with Common Core, updated ACSIP expectations, and TESS expectations. • Clarify relationship between ACSIP and Performance Improvement Plan (PIP) (p. 68). Can they be the same thing? • Clarify urban vs. rural strategies in intervening in persistently low-performing schools, including how State staff will be deployed. • More clearly articulate a mechanism for removal of leadership and staff and change in school governance. • More clearly delineate the consequences of failing to exit priority status after some reasonable period.

b. Are the identified interventions to be implemented in priority schools likely to —

   (i) increase the quality of instruction in priority schools;

   (ii) improve the effectiveness of the leadership and the teaching in these schools; and

   (iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

2.D.iii.b (including questions (i)-(iii)) Panel Response
Tally of Peer Responses: 1 Yes, 5 No

Response Component	Peer Panel Response
Rationale	The SEA's request includes some promising approaches to increasing educator effectiveness and student achievement. However, sufficient descriptions of specific interventions were not provided nor was detail provided on the SEA's authority to intervene directly into the management and resource allocation of schools and districts. Additionally, the SEA's Request did not address the application of its turnaround strategy to improve student achievement, graduation rates for all students, including English Learners, students with disabilities and the lowest-achieving students. This led the panel to conclude that the identified interventions to be implemented in priority schools are not likely to increase the quality of instruction in priority schools; improve the effectiveness of the leadership and the teaching in these schools; and improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students.

Response Component	*Peer Panel Response*
Strengths	• The SEA's diagnostic approach is a strength: "The ADE proposes to engage district leadership in diagnostic analysis and needs assessment in partnership with priority school leadership, with oversight for quality and effectiveness provided by the ADE. The ADE proposes to require priority schools to engage in comprehensive diagnostic analysis and needs assessment in tandem with an ADE School Improvement Specialist (SIS) and School Support Team from the ADE (p.67)." • The SEA's addendum attempts to address questions of increasing teacher quality – recruiting effective teachers, improving the capacity of teachers, removing ineffective teachers (Addendum, p. 3).
Weaknesses, issues, lack of clarity	• The flexibility request does not include sufficient details regarding specific interventions appropriate for chronically low-performing schools. The description seems better suited for focus schools. • The flexibility request did not address the application of its turnaround strategy to improve student achievement, graduation rates for all students, including English Learners, students with disabilities and the lowest-achieving students. • There is no clear explanation of the consequences of failing to exit priority status after some reasonable period. • The approach described does not address governance and management control of priority schools.
Technical Assistance Suggestions	• Focusing the combined subgroup on the lowest achieving students would improve the SEA's approach to priority schools. • More clearly explain the consequences of failing to exit priority status after some reasonable period. • More clearly articulate a mechanism for removal of leadership and staff and change in school governance. • Consider having the State staff lead (SIS) also sign the MOU with school and district leadership. • Ensure that interim measurable objectives (p.70) are well articulated and agreed to by the district, the state, and external providers.

c. *Note to Peers: Staff will review 2.D.iii.c*

2.D.iv Does the SEA's proposed timeline ensure that LEAs that have one or more priority schools will implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014−2015 school year?

➤ *Does the SEA's proposed timeline distribute priority schools' implementation of meaningful interventions aligned with the turnaround principles in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?*

2.D.iv Panel Response
Tally of Peer Responses: 4 Yes, 2 No

Response Component	Peer Panel Response
Rationale	The SEA's proposed timeline ensures that priority schools will implement interventions that may be aligned with the turnaround principles no later than 2014-15.
Strengths	• The timeline outlined on pp.69-72 is detailed, logical, and outlines a reasonable process to diagnose, plan, and monitor school improvement interventions beginning in 2012-13.
Weaknesses, issues, lack of clarity	• Some members of the panel voted no due to their concerns about the meaningfulness of the interventions.
Technical Assistance Suggestions	• See technical assistance suggestions in Sections 2.D., above, concerning the meaningfulness of interventions.

2.D.v Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?

    a. Do the SEA's criteria ensure that schools that exit priority status have made significant progress in improving student achievement?

       ➢ *Is the level of progress required by the criteria to exit priority status likely to result in sustained improvement in these schools?*

2.D.v and 2.D.v.a PANEL RESPONSE
Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	The expectation for priority schools being able to exit within two years is not commensurate to the level of need of chronically underperforming schools. The SEAs request specifies that "Priority Schools that meet their AMOs in proficiency <u>or</u> growth for two consecutive years in math and literacy (and graduation rate for high schools) for All Students and TAGG, and are making satisfactory progress on their PIP will be eligible to exit Priority Status" (p.73).
Strengths	None.
Weaknesses, issues, lack of clarity	• While exited priority schools are expected to continue to maintain the interventions that have been implemented, a specific expectation for how long they are expected to continue to maintain interventions is not stated. This does not meet the expectations of the flexibility guidance that interventions must be implemented for at least three years, even if the school exits priority status.
Technical Assistance Suggestions	• Consider using the criteria of meeting AMOs for proficiency and growth rather than or. This would make the exit criteria more rigorous.

2.E   Focus Schools

Note to Peers: Staff will review 2.E.i, 2.E.i.a, and 2.E.ii

2.E.i Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as focus schools? If the SEA's methodology is not based on the definition of focus schools in *ESEA Flexibility* (but is instead, *e.g.*, based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department's "Demonstrating that an SEA's Lists of Schools Meet ESEA Flexibility Definitions" guidance?

a. Note to Peers: Staff will review 2.E.i.a.

b. Is the SEA's methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?

2.E.i.b Panel Response
Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	The panel found that with one critical exception, the SEA's method of identifying focus schools tracks the methodology outlined in the flexibility package. The exception pertains to the SEA's exclusive reliance on the TAGG subgroup for purposes of identifying focus schools, which the panel found is not educationally sound because it could mask achievement gaps affecting members of the ESEA subgroups. As a result, schools with the greatest gaps between the achievement of their subgroup populations and other students in the State may not be identified as focus schools.
Strengths	• In an effort to overcome the omissions of schools from accountability as a result of the SEA's 40 n-size, the SEA created a combined group consisting of English Learners, students with disabilities, and economically disadvantaged students. • Recognizing the possibility that the TAGG group could mask achievement gaps affecting members of the ESEA subgroups, the SEA notes its intent to conduct additional analysis to ensure that the use of the TAGG will not mask larger gaps among ESEA subgroups (p. 74). • The use of three-year averages is a strength insofar as it helps ensure that persistence of need is recognized.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• While the SEA explains that it intends to conduct additional analysis, it appears to be outside of the standard approach for identifying focus schools. As a result, there is a likelihood that large achievement gaps affecting students with disabilities, English Learners, African-Americans and Hispanic students will be submerged within the smaller achievement gaps between TAGG and all students.
Technical Assistance Suggestions	Consider the following alternatives to the current TAGG methodology: o Including the traditionally under-performing African-American and Hispanic subgroups in the TAGG instead of the economically disadvantaged subgroup. o Holding schools accountable for individual disaggregated subgroup AMOs in addition to the combined subgroup. o Comparing the school's TAGG performance to the statewide median percentage of non-TAGG students' proficiency, and use that gap if it is greater than the within-school gap o Weighting the outcomes of African-American, Hispanic, and students with disabilities more heavily in measuring TAGG AMOs– e.g., giving them weight commensurate with their statewide or their schoolwide gap. o Reducing the minimum n-size to 20. o Modifying Full Academic Year (FAY) definition to use the student's presence in the school at the beginning of the year, as well as at the time the State test is taken, rather than requiring the same thing for two years, to ensure the outcomes of more students are considered within the accountability system.

2.E.ii   *Note to Peers: Staff will review 2.E.ii*

2.E.iii Does the SEA's process and timeline ensure that each LEA will identify the needs of its focus schools and their students and implement interventions in focus schools at the start of the 2012–2013 school year? Did the SEA provide examples of and justifications for the interventions the SEA will require its focus schools to implement? Are those interventions based on the needs of students and likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities?

➢ *Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?*

➢ *Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?*

2.E.iii Panel Response

Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	The SEA's request meets the timeline expectations of the guidance. However, the SEA has proposed a generic process of planning and identifying interventions that lacks specificity in describing interventions and their suitability to meet the needs of different student groups.
Strengths	• The emphasis on core beliefs and expectations for student learning in the diagnostic analysis is a strength (p.77). • The role of the State SIS to provide oversight is a potential strength if this role provides quality support as well as oversight (p.77). • The stated intent to establish interim measurable objectives (IMOs) to measure progress of improvement.
Weaknesses, issues, lack of clarity	• The process described by the SEA is largely a generic approach. The SEA notes that it will identify promising strategies to meet student needs but provides no specific examples of and justifications for the interventions the SEA will require its focus schools to implement. The SEA has not demonstrated that the interventions will be effective among its focus schools at increasing student achievement in schools with similar characteristics, needs, and challenges. Nor has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students). • Need to clarify whether focus schools have the resources to pay for self-audits, given that the expectation for a Scholastic audit differs for focus schools and priority schools. • The SEA does not specify the consequences for focus schools that do not improve after a reasonable period of time.
Technical Assistance Suggestions	• Describe specific research-based interventions appropriate for closing achievement gaps and sensitive to the grade-span of the school and particular populations of students. • Ensure that all focus schools have the resources to participate in a diagnostic process to determine their needs. • Specify consequences for focus schools that do not improve after a reasonable period of time.

2.E.iv Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

    a.   Do the SEA's criteria ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps?

    ➢   *Is the level of progress required by the criteria to exit focus status likely to result in sustained improvement in these schools?*

2.E.iv and 2.E.iv.a PANEL RESPONSE

Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	The SEA's criteria do not ensure that schools that exit focus school status have made significant progress in improving student achievement and narrowing achievement gaps. For example, the stated criteria of making either, but not both AMOs, two years in a row does not ensure significant progress and sustained improvement.
Strengths	• The annual AMOs for the TAGG set ambitious and achievable AMOs in that each school's AMOs are based on their 2011 proficiency and reducing the proficiency gap or growth gap in half by 2017. The SEA also notes that "requiring that all NCLB subgroups' progress contributing to the achievement gap are reported provides schools with an incentive to investigate and address the factors contributing to achievement gaps across the full spectrum of each school's diversity."
Weaknesses, issues, lack of clarity	• The SEA in its addendum states that focus schools that meet their AMOs for proficiency or growth for two consecutive years in math and literacy (and graduation rate for high schools) for All Students and TAGG, and are making satisfactory progress on their PIP will be eligible to exit focus status.
Technical Assistance Suggestions	• Consider using the criteria of meeting AMOs for proficiency AND growth rather than OR. This would make the exit criteria more rigorous. • Consider requiring three years of intervention and that schools improve sufficiently to be classified as Achieving schools before exiting status.

2.F   Provide Incentives and Support for other Title I Schools

2.F.i   Does the SEA's differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps?

2.F.i Panel Response

Tally of Peer Responses: 3 Yes, 3 No

Response Component	*Peer Panel Response*
Rationale	• The SEA's new DARTSS provides a single, unified accountability system focused on continuous improvement through diagnostics, planning, tiered support, and public reporting. It is applicable to all schools. The SEA articulates a well thought out delivery strategy based on tiered support and interventions leveraged by a high quality longitudinal data system. • However, the weakness of differentiation among schools within the very large Achieving category and the grant to all Achieving schools of a "reward," namely, exemption from the annual planning requirement, has the effect that most schools will have only modest incentives for improvement.
Strengths	• The SEA's strategy to provide strong universal support to all schools is leveraged by its nationally recognized longitudinal data system, which promises to facilitate educator access to outstanding digital content in the years to come. • The school classification system applies to all schools and creates incentives for improvement and triggers planning for needed supports through the ACSIP.
Weaknesses, issues, lack of clarity	• The lack of a parallel DARTSS system for districts decreases the likelihood of incentives and supports for other Title I schools.
Technical Assistance Suggestions	• Establish a process for assuring conscientious engagement in the rigorous planning process that the SEA describes. For example, if not done already, publish all ACSIP's on the web for public scrutiny and ensure they are linked to the school performance reports. If not done already, require that budgets for school improvement efforts be included on published ACSIPs. • Revamp the planning process to ensure it is a meaningful and iterative annual process (and not a compliance, paperwork exercise that starts over each year) that engages all schools in a well-structured examination of evidence, root-cause analysis of performance challenges, and improvement strategies that specifically address root causes, and are resourced appropriately. • Move to a school rating system that provides classifications of schools that adequately differentiates between high-performing schools and middle-performing schools as well as those with large gaps and those with chronic low-performance.

2.F.ii   Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities?

2.F.ii Panel Response

Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	• The SEA's new DARTSS provides a single, unified accountability system focused on continuous improvement through diagnostics, planning, tiered support, and public reporting. It is applicable to all schools. The SEA articulates a well thought out delivery strategy based on tiered support and interventions leveraged by a high quality longitudinal data system. • However, the weakness of differentiation among schools within the very large Achieving category and the grant to all Achieving schools of the most significant reward, namely, exemption from the one year planning requirement, has the effect that most schools will have only modest incentives to improve the achievement and growth of all students including English Learners and students with disabilities.
Strengths	• The SEA's strategy to provide strong universal support to all schools is leveraged by its nationally recognized longitudinal data system, which promises to facilitate educator access to outstanding digital content in the years to come. • The school classification system applies to all schools and creates incentives for improvement and triggers planning for needed supports through the ACSIP. • The SEA has streamlined its school performance reports and focus attention more clearly on student achievement (p. 94).
Weaknesses, issues, lack of clarity	• The lack of a parallel DARTSS system for districts decreases the likelihood of incentives and supports for other Title I schools. • The request fails to provide any detail on steps to be taken to assist LEAs and schools in improving the performance of English Learners and students with disabilities.
Technical Assistance Suggestions	• Establish a process for assuring conscientious engagement in the rigorous planning process that the SEA describes. For example, if not done already, publish all ACSIPs on the web for public scrutiny and ensure they are linked to the school performance reports. If not done already, require that budgets for school improvement efforts be included on published ACSIPs. • Revamp the planning process to ensure it is a meaningful annual process that engages all schools in a well-structured examination of evidence and root-cause analysis of their improvement challenges, and improvement strategies that specifically address root causes. • Move to a school rating system that provides classifications of schools that adequately differentiates between high-performing schools and middle-performing schools as well as those with large gaps and those with chronic low-performance. • Evaluate whether SES and choice are effective strategies for intervening in struggling schools in Arkansas, and consider revising legislation requiring SES and choice as appropriate.

2.G   Build SEA, LEA, and School Capacity to Improve Student Learning

2.G   Is the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity?

   i.   Is the SEA's process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools likely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools?

   ➢ *Did the SEA describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools that is likely to result in the identification of high-quality partners with experience and expertise applicable to the needs of the school, including specific subgroup needs?*

   ii.   Is the SEA's process for ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources) likely to result in successful implementation of such interventions and improved student achievement?

   iii.   Is the SEA's process for holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools, likely to improve LEA capacity to support school improvement?

2.G (including i, ii, and iii) Panel Response
Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response
Rationale	The SEA's process for ensuring timely and comprehensive monitoring of, and support for, implementation of interventions in priority and focus schools may not result in successful implementation of these interventions. The process for evaluating, supporting, and intervening in struggling LEAs is not sufficiently developed to be likely to improve LEA capacity to support school improvement.

Response Component	Peer Panel Response
Strengths	• The SEA's new DARTSS provides a single, unified accountability system focused on continuous improvement through diagnostics, planning, tiered support, and public reporting. It is applicable to all schools. The SEA articulates a delivery strategy based on tiered support and interventions leveraged by a high quality longitudinal data system. • The SEA recognizes the importance of a coherent strategy for integrating CCSS, the transition to new assessments, and the new teacher evaluation system. • The SEA recognizes the importance of reorganizing its delivery of services to LEAs and schools to remove silos and adopt a cohesive strategy.
Weaknesses, issues, lack of clarity	• Apart from unspecified steps to improve the use of Academic Distress status, the SEA did not provide details regarding how the State intends to build LEA capacity (pp. 47, 99). For example, there is no parallel district diagnostic discussed that is comparable to the one used for priority and focus schools. • The SEA did not describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools. • As yet, the SEA has not identified its new organizational structure to achieve greater coherence among previously isolated silos of State support and capacity building activities (p. 98).
Technical Assistance Suggestions	• Consider benchmarking district intervention strategies employed by states such as Illinois. • Consider adopting a differentiated classification system for LEAs, instead of relying entirely on an LEA's potential categorization as being in Academic Distress.

Principle 2 Overall Review

Is the SEA's plan for developing and implementing a system of differentiated recognition, accountability, and support likely to improve student achievement, close achievement gaps, and improve the quality of instruction for students? Do the components of the SEA's plan fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the State, its LEAs, its schools, and its students? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE
Tally of Peer Responses: 0 Yes, 6 No

Response Component	Peer Panel Response

Response Component	Peer Panel Response
Rationale	The SEA's plan for developing and implementing DARTSS, its system of differentiated recognition, accountability, and support, may not adequately improve student achievement, close gaps, and improve the quality of instruction. The components of the SEA's plan include a number of strengths but also major weaknesses that lead the panel to conclude that the plan does not create a coherent and comprehensive system that supports continuous improvement in the State, its LEAs, its schools, and its students.
Strengths	The panel identified a number of strengths throughout Principle 2. For example: • The SEA provides a strategy to provide universal support to all schools leveraged by its nationally recognized longitudinal data system, which promises to facilitate educator access to outstanding digital content in the years to come (p. 51). • The SEA's proposal recognizes the importance of aligning its efforts related to standards and assessments, differentiated accountability, and educator effectiveness initiatives. • In DARTSS, the All Students graduation rate, the non-TAGG and TAGG graduation rates, as well as NCLB subgroup graduation rates will be calculated and reported (p.52). • The SEA proposes both status and growth to standard AMOs. Also, students who are proficient but not making adequate annual growth will be held accountable (p.51).
Weaknesses, issues, lack of clarity	The panel identified numerous weaknesses throughout Principle 2. For example: • Lack of specificity in description of interventions for rriority and focus schools. • Inadequate differentiation in the proposed school classification system, which may result in a large majority of schools in the Achieving category. According to the phone call the panel had with the SEA, this method has not yet been field tested or simulated. • The system appears to mask lower performance of African Americans, Hispanics, students with disabilitiess and English Learners by relying on data generated from a combined subgroup (TAGG). • The 6 percent variance requested in setting AMOs is not educationally justified given the availability of other options to remedy what is at this point only a perceived problem given the lack of simulations on data generated in prior years. • The methodology for identifying Exemplary Schools lacks development and does not include growth to standard. It appears that some of the high progress schools identified may not have either high achievement or high growth to standard. If so, the recognition may not be considered meaningful. • The interventions for priority schools described do not appear to fully align with the turnaround principles. • The SEA has not demonstrated that the interventions for focus schools will be effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools.

Response Component	Peer Panel Response
Technical Assistance Suggestions	The panel provided a variety of TA suggestions throughout Principle 2. Some highlights include: • The SEA should consider using the TAGG in addition to the other ESEA subgroups instead of in place of them. • Differentiate within the "achieving" group to indicate relatively lower and higher achievers to create incentives and provide support for schools falling in the bottom range of that category. • Move to a school rating system that provides classifications of schools that adequately differentiates between high-performing schools and middle-performing schools as well as those with large gaps and those with chronic low-performance. Consider the alternatives listed under 2.A.i.a. • The SEA should consider using a three-year combined cohort aggregating all students enrolled plus the latest year levels and using whichever quantities are greater. This might offset the problem the SEA is attempting to solve with the 6 percent variance. The SEA might also consider using a multi-measure framework that rates schools on the indicators chosen but then rolls up the multiple ratings into a single rating for the school. • Revamp the planning process to ensure it is a meaningful annual process that engages all schools in a well-structured examination of evidence and root-cause analysis of their improvement challenges, and improvement strategies that specifically address root causes.

Principle 3: Supporting Effective Instruction and Leadership

3.A   Develop and Adopt Guidelines for Local Teacher and Principal Evaluation and Support Systems

3.A.i   Has the SEA developed and adopted guidelines consistent with Principle 3 through one of the two options below?

If the SEA selected **Option A**:
If the SEA has not already developed and adopted all of the guidelines consistent with Principle 3:

   i.   Is the SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2011–2012 school year?

3.A.i, Option A.i Panel Response
☐ *Not applicable because the SEA selected 3.A, Option B*
Tally of Peer Responses: 3 Yes, 3 No

Response Component	Peer Panel Response
Rationale	The panel is evenly split on whether the SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems is likely to result in successful adoption of those guidelines by the end of the 2011–2012 school year. Regulations are slated for adoption by SBE on July 2012. According to the phone call with the SEA staff, proposed regulations have been drafted and will be presented to the State Board at its April meeting. Provided that no substantive revisions are required that call for subsequent public comment prior to adoption, the SEA may adopt its regulations on time. However, several panel members expressed doubt that this timeline could be met.
Strengths	• TESS legislation already passed (2011). • Implementation timeline and activities are underway, with public release for comment in April, leading to a proposed adoption in July 2012 (just after 2011-2012 school year/prior to start of the next school year).
Weaknesses, issues, lack of clarity	• Given the debates about (1) the approach to measuring growth and (2) how the guidelines will assure that growth on State assessments is a significant factor in evaluations referenced in the request, a concern arises whether the guidelines can be approved by July.
Technical Assistance Suggestions	None.

   ii.   Does the SEA's plan include sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i, Option A.ii Panel Response
☐ *Not applicable because the SEA selected 3.A, Option B*
Tally of Peer Responses: 6 Yes, 0 No

Response Component	Peer Panel Response
Rationale	The involvement of teachers and principals in the development of these guidelines is sufficient because of the sustained involvement of the State teacher education and administrators associations, via representation, across meetings and convenings that occurred with frequency across several months.
Strengths	- Incorporated recommendations of the 2009 workgroup (which collaborated with Charlotte Danielson) on the Danielson Framework to develop and recommend an evaluation framework. A broad array of stakeholders were included in this workgroup. - After passage of TESS legislation in 2011, the SEA created a stakeholder committee, called the rules committee, and gave it authority to draft the evaluation guidelines. - The rules committee includes representation and participation from: - AEA – The State education association – participated on the rules committee - AAEA – The State administrators association – participated on the rules committee, including representation from Arkansas Association of Special Education Administrators, but no mention is made of representation by English Learner administrators or teachers. - A handful of others, see p. 105 50 percent of the attendees at 10 public meetings held to solicit comment and feedback on the proposed rules and regulations were administrators - The SEA conducted focus groups with teachers and other representatives of students with disabilities and English Learners. (p 105, 107).
Weaknesses, issues, lack of clarity	English Learners and students with disabilities: The review and feedback solicitation meetings with English Learners and students with disabilities stakeholders occurred in Mid-February and March; some panel members question the timing of the scheduling of the focus groups and whether it allowed for meaningful participation.
Technical Assistance Suggestions	The education and development of teachers is essential to successful implementation. The success of the new TESS system will be enhanced with greater involvement of teachers, including students with disabilities and English Learner teachers.

iii.   *Note to Peers: Staff will review iii.*

<u>If the SEA selected **Option B**</u>:
If the SEA has developed and adopted all guidelines consistent with Principle 3:

i. Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement? (See question 3.A.ii to review the adopted guidelines for consistency with Principle 3.)

3.A.i, Option B.i Panel Response
☒ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

ii. *Note to Peers: Staff will review ii.*

iii. Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i, Option B.iii Panel Response
☒ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

ONLY FOR SEAs SELECTING OPTION B: If the SEA has adopted all guidelines for local teacher and principal evaluation and support systems by selecting Option B in section 3.A, review and respond to peer review question 3.A.ii below.

3.A.ii Are the SEA's guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — *i.e.,* will they promote systems that:

a. Will be used for continual improvement of instruction ?
  ➢ *Are the SEA's guidelines likely to result in support for all teachers, including teachers who are specialists working with students with disabilities and English Learners and general classroom teachers with these students in their classrooms, that will enable them to improve their instructional practice?*

3.A.ii.a Panel Response
☒ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

b. Meaningfully differentiate performance using at least three performance levels?

  ➢ *Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?*

3.A.ii.b Panel Response
☒ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

c. Use multiple valid measures in determining performance levels, including as a significant factor data on student growth for all students (including English Learners and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources, such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys)?

(i) Does the SEA have a process for ensuring that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?

3.A.ii.c(i) Panel Response
☒ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

(ii) For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a statewide approach for measuring student growth on these assessments?

3.A.ii.c(ii) Panel Response
☒ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

(iii) For grades and subjects in which assessments are not required under ESEA section 1111(b)(3), does the SEA either specify

the measures of student growth that LEAs must use or select from or plan to provide guidance to LEAs on what measures of student growth are appropriate, and establish a system for ensuring that LEAs will use valid measures?

3.A.ii.c(iii) Panel Response
☒ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

d.   Evaluate teachers and principals on a regular basis?

3.A.ii.d Panel Response
☒ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: NA

Response Component	Peer Panel Response
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

e.   Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?
  ➢ *Will the SEA's guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?*

  ➢ *Are the SEA's guidelines likely to result in differentiated professional development that meets the needs of teachers?*

3.A.ii.e Panel Response
☒ *Not applicable because the SEA selected 3.A, Option A*
Tally of Peer Responses: NA

Response Component	Peer Panel Response

Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

f.   Will be used to inform personnel decisions?

3.A.ii.f Panel Response

☒ *Not applicable because the SEA selected 3.A, Option A*

Tally of Peer Responses: NA

Response Component	*Peer Panel Response*
Rationale	Not applicable.
Strengths	Not applicable.
Weaknesses, issues, lack of clarity	Not applicable.
Technical Assistance Suggestions	Not applicable.

3. B   Ensure LEAs Implement Teacher and Principal Evaluation and Support Systems

3.B   Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems?

➢ *Does the SEA have a process for reviewing and approving an LEA's teacher and principal evaluation and support systems to ensure that they are consistent with the SEA's guidelines and will result in the successful implementation of such systems?*

➢ *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*

➢ *Did the SEA describe the process it will use to ensure that all measures used in an LEA's evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA (i.e., process for ensuring inter-rater reliability)?*

➢ *Does the SEA have a process for ensuring that teachers working with special populations of students, such as students with disabilities and English*

Learners, are included in the LEA's teacher and principal evaluation and support systems?

➢ *Is the SEA's plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013−2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014−2015 school year; or (2) implementing these systems no later than the 2013−2014 school year?*

➢ *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*

➢ *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*

➢ *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA's evaluation and support systems?*

3.B Panel Response
Tally of Peer Responses: 3 Yes, 3 No

Response Component	Peer Panel Response
Rationale	The panel is divided on whether the SEA's plan is likely to lead to high-quality local teacher and principal evaluation and support systems. The main concern is whether the statutory structure and regulations will ensure that student growth, as measured on statewide assessments, is a significant factor in educator evaluations.

Response Component	Peer Panel Response
Strengths	• TESS legislation names eight specific objectives for legislation (p. 103 of request and in legislation at p. 84 of Attachments) which make the effectiveness of evaluations, if implemented properly, highly likely to lead to the development of systems that improve student achievement and the quality of instruction for students, including but not limited to these stated objectives: "provide a basis for making teacher employment decisions, encourage highly effective teachers to undertake challenging assignments." • TESS established standards for a consistent and uniform evaluation system for the support and improvement of teacher effectiveness statewide. Districts must pilot the State model or use a nationally recognized model that meets TESS requirements and is approved by the SEA by 2013-2014. The teacher evaluation system created by TESS will be in place and fully implemented for all districts by 2014-2015. • 4- tier observational rubric (Charlotte Danielson's). • Acknowledgement of importance of inter-rater reliability and the need for adequate professional development on and norming of observation rubric raters. • Requirement that the State Board of Education licenses evaluators of teachers (TESS legislation, p. 86 of attachments). • Novice teacher mentoring and induction is mandated (TESS legislation, p. 92 of attachments). • Employs an "interim teacher appraisal" (not a summative evaluation) as a key support mechanism in professional development (TESS legislation, p. 92 of attachments.) • Beginning with the 2017-2018 school year, the school report card (and district reporting requirements) will include the number of teachers at a school, the number of HQ teachers, the number of teachers rated proficient or higher, and the number of National Board Cert. teachers. • A cap on the length of time a teacher can remain in "intensive support status" (not more than two consecutive semesters, "unless the teacher has substantially progressed and the evaluator elects to extend" for up to two more additional consecutive semesters (emphasis ours). • Termination/non-renewal right reserved by superintendent at end of support status timeframe for teachers who do not meet goals. • Annual summative evaluations for teachers in years one through three (novice and probationary) and teachers who came out of intensive support status within the current or previous school year. • Builds on the principal evaluation workgroup's ISLLC based rubric and a 10 school pilot in school year 2011-12; SEA requirement that student growth weight in the principal evaluation matches the growth weight in the teacher evaluation. • The SEA pilot tested the observation rubric in a number of schools in 2010-2011, and plans to pilot the full system statewide in 2013-2014, including growth measured on State assessments (Colorado model), and then implement the full system statewide in 2014-2015, using the PARCC assessment. • The State acknowledged a number of concerns that surround both the growth model and how student achievement will be incorporated into the teacher evaluation system (p. 107).

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• The statutory structure, which bases teacher evaluations on the four Danielson criteria and provides that, for tested subjects, student growth will count as 50 percent of the evidence on those criteria, but does not specify that student growth will itself be an evaluative criterion, creates a concern that student growth will not be a significant factor in some or all teacher evaluation outcomes. • For English Language and students with disabilities teachers, the content of the plan lacks sufficiency beyond mention of differentiated support. • Summative evaluations every three years for non-intensive support status teachers (who are also not novice/probationary) ratchets up the importance of an "interim teacher appraisal process" and that change is not fully explained in the flexibility request.
Technical Assistance Suggestions	• Provide additional detail on how the practice of English Learner and students with disabilities teachers will be developed and supported to enable English Learner and students with disabilities students achieve at high levels. • Provide models for LEAs of what a robust "interim appraisal process" looks like, how it sits within a coaching cycle, and how it can be linked to broader development initiatives/focus in a school. • Several panelists recommend that the SEA include in its regulations a requirement that student growth be a significant criterion in a teacher's evaluation, including growth measured on the State assessments, and not simply a significant artifact used to determine whether other criteria are met.

Principle 3 Overall Review

If the SEA indicated that it has not developed and adopted all guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by selecting Option A in section 3.A, is the SEA's plan for the SEA's and LEAs' development and implementation of teacher and principal evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

If the SEA indicated that is has adopted guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by selecting Option B in section 3.A, are the SEA's guidelines and the SEA's process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Principle 3 Overall Review Panel Response

Tally of Peer Responses: 3 Yes, 3 No

Response Component	Peer Panel Response
Rationale	Though unanimous in its support for the educator engagement the SEA conducted during the development of regulations by the rule committee, the panel is divided on whether the SEA's plan is likely to lead to high-quality local teacher and principal evaluation and support systems. The main concerns are (1) whether a summer adoption date is realistic given potentially substantive changes that may exist and (2) whether the statutory structure and regulations will ensure that student growth, as measured on statewide assessments, is a significant factor in educator evaluations.
Strengths	• Intention to help LEAs think (via cross-agency data sharing) about the pipelines into their systems through the lens of educator effectiveness, to encourage LEAs to become more savvy about which pipeline they draw from; to trace teacher effectiveness data back to the institutions teachers are sourced from (Institutions of higher education, alternative prep programs) (p. 114). • TESS legislation names eight specific objectives for legislation (p. 103 of request and in legislation at p. 84 of Attachments) which make the effectiveness of evaluations, if implemented properly, highly likely to lead to the development of systems that improve student achievement and the quality of instruction for students, including but not limited to these stated objectives: "provide a basis for making teacher employment decisions, encourage highly effective teachers to undertake challenging assignments." • TESS established standards for a consistent and uniform evaluation system for the support and improvement of teacher effectiveness statewide. Districts must pilot the State model or use a nationally recognized model that meets TESS requirements and is approved by the SEA by 2013-2014. The teacher evaluation system created by TESS will be in place and fully implemented for all districts by 2014-2015. • 4- tier observational rubric (Charlotte Danielson's). • Acknowledgement of importance of inter-rater reliability and the need for adequate professional development on and norming of observation rubric raters. • Requirement that the State Board of Education licenses evaluators of teachers (TESS legislation, p. 86 of attachments).

Response Component	Peer Panel Response
Strengths	- Novice teacher mentoring and induction is mandated (TESS legislation, p. 92 of attachments). - Employs an "interim teacher appraisal" (not a summative evaluation) as a key support mechanism in professional development (TESS legislation, p. 92 of attachments.) - Beginning with the 2017-2018 school year, the school report card (and district reporting requirements) will include the number of teachers at a school, the number of HQ teachers, the number of teachers rated proficient or higher, and the number of National Board Cert. teachers. - A cap on the length of time a teacher can remain in "intensive support status" (not more than two consecutive semesters, "unless the teacher has substantially progressed and the evaluator elects to extend" for up to two more additional consecutive semesters (emphasis ours). - Termination/non-renewal right reserved by superintendent at end of support status timeframe for teachers who do not meet goals. - Annual summative evaluations for teachers in years one through three (novice and probationary) and teachers who came out of intensive support status within the current or previous school year. - Builds on the principal evaluation workgroup's ISLLC based rubric and a 10 school pilot in school year 2011-12; SEA requirement that student growth weight in the principal evaluation matches the growth weight in the teacher evaluation. - The SEA pilot tested the observation rubric in a number of schools in 2010-2011, and plans to pilot the full system statewide in 2013-2014, including growth measured on State assessments (Colorado model), and then implement the full system statewide in 2014-2015, using the PARCC assessment. - The State acknowledged a number of concerns that surround both the growth model and how student achievement will be incorporated into the teacher evaluation system (p. 107).
Weaknesses, issues, lack of clarity	- How the observation rubric sits within a coaching cycle for the teacher is not clear, this may be intentional to allow for LEA autonomy on professional development. - Lack of focus on the professional development needs of all teachers who instruct English Learners and students with disabilities to ensure these students have equal access and success in mastering content on CCSS. - The statutory structure, which bases teacher evaluations on the four Danielson criteria and provides that, for tested subjects, student growth will count as 50 percent of the evidence on those criteria, but does not specify that student growth will itself be an evaluative criterion, creates a concern that student growth will not be a significant factor in some or all teacher evaluation outcomes. - For English Language and students with disabilities teachers, the content of the plan lacks sufficiency beyond mention of differentiated support. - Summative evaluations every three years for non-intensive support status teachers (who are also not novice/probationary) ratchets up the importance of an "interim teacher appraisal process" and that change is not fully explained in the flexibility request.

Response Component	Peer Panel Response
Technical Assistance Suggestions	• Provide explicit models for LEAs to help them think about how to nest the clinical observations (interim and summative) in a coaching cycle that has progressive expectations for how a teacher should perform on the rubric as he/she grows her practice (induction – veteran teachers); • Enhance teacher development and support, particularly to help meet the needs of English Learners and students with disabilities; and provide models and exemplars of teacher behaviors and evidence of the Planning & Preparation and Instruction categories of the clinical observation to illustrate how to use data systems to aid in teacher's role as diagnostician and to illustrate how to set precise goals for student learning that is differentiated. • Provide additional detail on how the practice of English Learner and students with disabilities teachers will be developed and supported to enable English Learner and students with disabilities students achieve at high levels. • Provide models for LEAs of what a robust "interim appraisal process" looks like, how it sits within a coaching cycle, and how it can be linked to broader development initiatives/focus in a school. • Several panelists recommend that the SEA include in its regulations a requirement that student growth be a significant criterion in a teacher's evaluation, including growth measured on the State assessments, and not simply a significant artifact used to determine whether other criteria are met.

Overall Request Evaluation

Did the SEA provide a comprehensive and coherent approach for implementing the waivers and principles in its request for the flexibility? Overall, is implementation of the SEA's approach likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Overall Request Evaluation Panel Response

Response Component	Peer Panel Response
Rationale	Despite many promising features, the SEA's flexibility request did not provide a comprehensive and coherent strategy for implementing the waivers and principles and left panel members with significant doubts about whether the SEA's approach is likely to increase the quality of instruction for students and improve student achievement. Important issues to be addressed, among others raised throughout these notes, are: • A lack of evidence of: comprehensive supports to assist all educators whose schools and classrooms include students with disabilities to transition to the CCSS; alignment of English Language Proficiency standards to CCSS. • A school-accountability system that does not appear to: meaningfully differentiate among Title I schools, including schools not designated as reward, focus or priority schools; create proper incentives by attaching meaningful consequences to continuing achievement gaps among all student populations; and give LEAs incentives to encourage and support schools in making these improvements. • A system of differentiated supports for schools that does not: provide sufficient specificity as to interventions for priority and focus schools; assure that interventions for priority schools align fully with the turnaround principals and promise dramatic and system change; and assure that interventions for focus schools will be effective at increasing student achievement in schools with the particular needs of each such school. • Doubts on the part of some panel members about the SEA's ability to finalize educator-evaluation regulations by the end of the current school year, and about the soundness of using measures of student growth as evidence of qualitative criteria such as planning and preparation and professional responsibility, rather than treating student growth as a separate, significant evaluative criterion.
Strengths	• Adoption of the CCSS. • Strong instructional and implementation support for LEAs and schools as they transition to the CCSS. • Efforts to align new core standards, assessments, school accountability and educator-effectiveness initiatives. • Reporting of achievement, growth and graduation rates for all students, TAGG students and subgroup members. • A strategy for providing universal support to all schools leveraged by a nationally recognized data system. • Legislation establishing statewide standards for teacher evaluation, with a sound four-tier observational rubric, controls for evaluator quality, limits on the length of time a teacher rated ineffective can remain in "intensive support status" before being removed from the classroom, and a pilot strategy leading to full implementation.

Response Component	Peer Panel Response
Weaknesses, issues, lack of clarity	• A lack of evidence of comprehensive supports to assist all educators whose schools and classrooms include students with disabilities to transition to the CCSS. • Uncertainty whether English Language Proficiency standards align to CCSS. • An absence of evidence that the categories and attached rewards and consequences included in the DARTTS accountability system will meaningfully differentiate among Title I schools, including the large number of schools not designated as reward, focus or priority schools. • A risk that basing consequential accountability primarily on the achievement of all students and TAGG students will mask achievement gaps for students with disabilities, English Learners, African-American and Hispanic students that are considerably larger than those between TAGG and all students • Concerns about low-performing students whose outcomes may not be accounted for as a result of the SEA's requested 6 percent variance in calculating AMOs, large minimum n-size, and FAY definition. • An absence of LEA incentives to encourage and support schools in improving student outcomes. • Insufficient specificity as to interventions for priority and focus schools. • Interventions for priority schools that do not appear to align fully with the turnaround principals or to promise dramatic and systemic change. • Interventions for Focus Schools that may not be effective at increasing student achievement in schools with the particular needs of each such school. • Doubts on the part of some panel members about the SEA's ability to finalize educator-evaluation regulations by the end of the current school year. • Doubts on the part of some panel members about the approach of using student growth on State and other assessments as evidence of criteria such as planning and preparation, classroom environment and professional responsibility, rather than as a separate, significant evaluative factor.

Response Component	Peer Panel Response
Technical Assistance Suggestions	The panel provided a variety of TA suggestions. Some highlights include: Principle 1: Ensure that the SEA takes the necessary steps to assist LEAs, schools, and educators to identify the extent of the shifts (including grade shifts) required to bring curricula, materials, instruction and assessments into conformity with the CCSS. Consider enhancing the ELA Big Shifts document comparably to the math Big Shifts document. Develop supports to assist educators of students with disabilities in all instructional settings to transition to CCSS. Principle 2: • The SEA should consider using the TAGG in addition to the other ESEA subgroups instead of in place of them. • Differentiate within the "achieving" group to indicate relatively lower and higher achievers to create incentives and provide support for schools falling in the bottom range of that category. • Move to a school rating system that provides classifications of schools that adequately differentiates between high-performing schools and middle-performing schools as well as those with large gaps and those with chronic low-performance. Consider the alternatives listed under 2.A.i.a. • The SEA should consider using a three-year combined cohort aggregating all students enrolled plus the latest year levels and using whichever quantities are greater. This might offset the problem the SEA is attempting to solve with the 6 percent variance. The SEA might also consider using a multi-measure framework that rates schools on the indicators chosen but then rolls up the multiple ratings into a single rating for the school. • Revamp the planning process to ensure it is a meaningful annual process that engages all schools in a well-structured examination of evidence and root-cause analysis of their improvement challenges, and improvement strategies that specifically address root causes. Principle 3: • Several panelists recommend that the SEA include in its regulations a requirement that student growth be a significant criterion in a teacher's evaluation, including growth measured on the State assessments, and not simply a significant artifact used to determine whether other criteria are met. • To enhance teacher development and support, particularly to help meet the needs of EL and SWD students, provide models and exemplars of teacher behaviors and evidence of the Planning & Preparation and Instruction categories of the clinical observation to illustrate how to use data systems to aid in teacher's role as diagnostician and to illustrate how to set precise goals for student learning that is differentiated. • Provide additional detail on how the practice of EL and SWD teachers will be developed and supported to enable EL and SWD students achieve at high levels. • Provide models for LEAs of what a robust "interim appraisal process" looks like, how it sits within a coaching cycle, and how it can be linked to broader development initiatives/focus in a school.